



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

**1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733**

November 20, 2013

Mr. Matt Wickham
Pastor, Behling & Wheeler LLC
620 E. Airline
Victoria, TX 77901

Re: EPA's Comments on the Draft Technical Scope of Work for AOI-1 Dated October 2, 2013 for the US Oil Recovery Superfund Site

Mr. Wickham

EPA received a Draft Technical Scope of Work for AOI-1 dated October 2, 2013 via email. Due to the Federal Government shutdown we were able to gain access to this document only after the government opened on October 17, 2013. EPA has reviewed this document and has found that this document addresses most of the issues identified and discussed earlier. However, a few issues remain that need to be clarified or refined and are given below.

General Comments

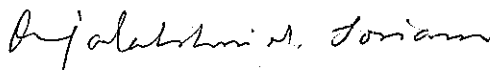
1. All the known releases and contaminants from the MCC property (AOI-2) that originated from the USOR property (AOI-1) are not discussed in this document. This information needs to be considered when establishing sample locations and contaminants that need to be sampled in the first iteration. A discussion of pipes and pathways between the two properties may help resolve some issues. If pipes between the two properties were used to transport material that was then released at the MCC property, then additional sampling may be needed.
2. The figures and tables that show historic releases in attachment D-1 are helpful. However, they do not provide the resolution that is needed to verify that all historic releases are sampled. Adjustments to the sampling plan may be needed based on field observations and additional site history information. Additional samples may be needed if other releases are identified. If direct discharges to Vince Bayou are identified then sediment sampling may be needed in the first iteration of sampling where discharges occur.
3. The Federal and State Trustees will need to be included in the discussions and decision making as the RI progresses.

Specific Comments

3. **Figure 6:** The number of on-site sediment samples is not sufficient. Only 2 samples are shown. The number should be at least six so that a simple statistical analysis can be done. Sediments in low lying areas including that in the parking lot should be sampled.
4. **Figure 6:** Additional soil samples are needed off property where source material was stored near the property fence.
 - Specifically between SB29 and SB33 where flooding has occurred and where material was stored.
 - Another off-property sample is needed near SB33 and SB34.
 - Additional samples are needed outside of fence between SB44 and SB8.
 - Additional soil or sediment samples are needed near ditch close to SB5.
 - More samples are needed outside the fence between SB20 and MW11.
5. **Figure 6:** Show the location of the various pipelines if available. If not they can be included in the later RI documents as the information becomes available.

As discussed earlier, let's plan to discuss these comments via a conference call. If you have questions please contact me at 214-665-8529.

Sincerely,



Raji Josiam
Remedial Project Manager, Superfund Division

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